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February 9, 2011

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **EX PARTE PRESENTATION**
WT Docket No. 05-265

Dear Ms. Dortch:

In response to a series of questions from Commission staff, T-Mobile is providing the following additional information for the record in the above-referenced proceeding.

What standard/technology does your home network use?

T-Mobile's network uses GSM/GPRS/EDGE on PCS/1900 MHz spectrum and UMTS/HSPA+ on AWS/1700-2100 MHz spectrum.

Do you currently offer 3G or 4G service on your home network? If not, what, specifically, are your plans for doing so?

T-Mobile currently offers 3G and 4G (HSPA+) services on its home network. Today, T-Mobile offers a 4G customer experience in over 100 metropolitan areas, currently reaching more than 200 million people coast to coast. This year we plan to further expand our HSPA+ network and double its theoretical speeds for 140 million Americans by mid-year. T-Mobile's rollout of 3G and 4G services, and the ways in which the availability of voice and 2G data roaming has facilitated that rollout, are discussed in more detail in T-Mobile's February 2nd Ex Parte Letter.^{1/}

^{1/} See Letter from Thomas J. Sugrue, Senior Vice President, Government Affairs, T-Mobile USA, Inc. to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 05-265 (filed Feb. 2, 2011) ("*February 2nd Ex Parte Letter*") at 2-3.

Do you sell devices that can operate on other carriers' networks (i.e. are banded to compatible spectrum)?

As T-Mobile explained in its November 2, 2010, Ex Parte Letter,^{2/} T-Mobile currently sells devices that are capable of working on other operators' GSM/GPRS/EDGE networks, Cellular (800 MHz) networks, as well as European bands of 900 MHz and 1800 MHz. These bands allow subscribers to access 2G service throughout the United States and most of the world. T-Mobile has also begun to offer its customers 3G and 4G devices that can operate on other carrier bands, including HSPA+ technology on PCS/1900 MHz, Cellular/800 MHz, and Global 2100 MHz. Although the capabilities vary slightly by handset, each release of handsets moves all carriers closer to supporting multiband 4G capable phones, just as the industry standard now supports multiband 2G capable phones. Finally, T-Mobile can add chips to its future handsets to support other spectrum bands with the certainty of a data roaming rule.

What current data roaming agreements do you currently have? Nationwide 2G, 2.5G, 3G? Regional 3G? 4G?

T-Mobile currently has nationwide roaming agreements in place for GSM/GPRS/EDGE (2.5G) services. T-Mobile does not have any current outbound 3G or 4G roaming enabled, although T-Mobile has made its 3G and 4G network available to inbound roamers as part of our standard existing roaming agreements for data. We welcome such agreements. As indicated in our February 2nd Ex Parte Letter,^{3/} although T-Mobile has sought a roaming agreement with AT&T for 3G and better service, we have not been able to achieve such an agreement and as a result our current roaming agreement is limited to 2G and 2.5G services.

In the past 36 months have you been unable to negotiate and/or obtain a roaming agreement? If so, for what reasons?

In the past 36 months, T-Mobile has not entered into any outbound 3G or 4G roaming agreements for the following reasons: (1) potential roaming partners were willing to offer 2G and 2.5G roaming, but would not offer access to their 3G network; (2) the pricing offered for 3G roaming was so unreasonable as to make it uneconomic for T-Mobile to offer the roaming feature to our subscribers; (3) the roaming footprint offered overlaps with existing T-Mobile coverage; and (4) the conditions placed on T-Mobile's ability to limit network overlap make the level of in-market roaming impractical and uneconomic.

^{2/} See Letter from Thomas J. Sugrue, Senior Vice President, Government Affairs, T-Mobile USA, Inc. to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 05-265 (filed Nov. 9, 2010) ("*November 9th Ex Parte Letter*") at 1.

^{3/} See February 2nd Ex Parte Letter at 4.

What assurances can roaming providers give the Commission that a data roaming obligation right now is essential to permit or accelerate network upgrades by the roaming provider?

As T-Mobile has discussed in each of its filings in this proceeding, including most recently the February 2nd Ex Parte Letter,^{4/} and as the record before the Commission overwhelmingly confirms, the availability of a rule requiring data roaming on reasonable terms and conditions is essential to ensure competitive wireless service and increased access to mobile broadband for consumers, as well as to promote continued investment by wireless carriers in their own network construction. As T-Mobile has shown, the availability of voice roaming has created economic incentives for T-Mobile to expand its network that would not have existed but for the increase in demand for T-Mobile service by customers in areas where T-Mobile originally maintained coverage through roaming arrangements.^{5/} Voice roaming has enabled T-Mobile to locate call centers in areas in which it previously lacked coverage and build a facilities-based footprint over time as a customer base developed. These facts make clear that a voice roaming requirement has been essential to encouraging and facilitating network deployment by competitive providers.

As T-Mobile and virtually all other wireless carriers with the exception of AT&T and Verizon have emphasized, the reasons that let the Commission to adopt a voice roaming obligation apply with equal and perhaps greater force to data services.^{6/} The increasing adoption of smartphones is rapidly shifting the volume of wireless traffic from voice to data, and as carriers such as T-Mobile deploy 4G technologies, voice itself increasingly is becoming a data service. In addition, consumers do not distinguish between voice and data services in their expectations of roaming capabilities, and consumers expect that their wireless devices will operate seamlessly when they travel – regardless of whether they are using voice or data services.

^{4/} See February 2nd Ex Parte Letter at 2.

^{5/} *Id.* at 2-4.

^{6/} See, e.g., Comments of T-Mobile USA, Inc., WT Docket No. 05-265 (filed June 14, 2010) at 4-10.

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In light of these factors, the public interest overwhelmingly favors extension of a requirement similar to the voice roaming rule to data services. Consistent with the near-unanimous support in the record and the sound recommendations in the 2010 National Broadband Plan, T-Mobile urges the Commission to promptly adopt a requirement that data roaming be made available on just, reasonable, and nondiscriminatory terms and conditions.

Please direct any questions concerning this filing to the undersigned.

Sincerely,

/s/

Thomas J. Sugrue
Senior Vice President, Government Affairs

cc: (all via e-mail)
Ruth Milkman
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